

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE MOLYCORP, INC. SECURITIES  
LITIGATION

Civil Action No. 13 Civ. 5697 (PAC)

CLASS ACTION

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR FINAL APPROVAL OF  
PROPOSED CLASS ACTION SETTLEMENT AND PLAN OF ALLOCATION**

PLEASE TAKE NOTICE that pursuant to Federal Rules of Civil Procedure 23 and this Court's January 18, 2017 Preliminary Approval Order (as modified on March 10, 2017), which preliminarily approved the proposed settlement and approved notice to the class, *inter alia*, and upon the accompanying: (i) Declaration of Ira M. Press in Support of Final Approval of the Proposed Class Action Settlement, Plan of Allocation, Award of Attorneys' Fees, and Reimbursement of Litigation Expenses, dated April 10, 2017; (ii) the Memorandum of Law in Support of Plaintiffs' Motion for Final Approval of Proposed Class Action Settlement and Plan of Allocation; (iii) the Declaration of Brian Manigault Regarding Notice and Mailing to the Settlement Class; Publication; Website; Telephone Line; and Report on Receipt of Exclusion Requests and Objections, dated April 7, 2017; and (iv) all other papers and proceedings herein, Lead Plaintiff Gary Armstrong ("Lead Plaintiff"), individually and on behalf of all others similarly situated, and additional Plaintiffs Ronald Simmers, Gail Fialkov, Macie Jurkowski, Paul Saldana, Brett Huber, and Alan Trempe (collectively with Lead Plaintiff, "Plaintiffs"), will and do hereby move this Court, before the Honorable Paul A. Crotty, on May 15, 2017 at 4:30 p.m. in Courtroom 14C, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007-1312, or such other location and time as set by the Court, for entry of a Judgment approving the Settlement as fair, reasonable and adequate and for

entry of an Order approving the proposed Plan of Distribution as fair and reasonable. A copy of the [Proposed] Final Judgment and Order of Dismissal with Prejudice, which was previously filed on November 18, 2016 in connection with the Preliminary Approval Motion (ECF No. 78-1), is attached hereto.

Dated: April 10, 2017

Respectfully submitted,

KIRBY McINERNEY LLP

By: /s/ Ira M. Press  
Ira M. Press  
825 Third Avenue, 16th Floor  
New York, NY 10022  
Telephone: (212) 371-6600  
Facsimile: (212) 751-2540

*Plaintiffs' Lead Counsel*

POMERANTZ LLP  
Jeremy A. Lieberman  
Matthew L. Tuccillo  
600 Third Avenue, 20th Floor  
New York, New York 10016  
Telephone: (212) 661-1100  
Facsimile: (212) 661-8665

LAW OFFICES OF KENNETH ELAN,  
ESQ.  
Kenneth Elan  
217 Broadway, Suite 603  
New York, New York 10007  
Telephone: (212) 619-0261  
Facsimile: (212) 385-2707

*Additional Counsel for Plaintiffs*